



Office of the City Attorney
Susana Alcala Wood, City Attorney

Sandra G. Talbott
Chief Assistant City Attorney

Deputy City Attorneys

Audreyell A. Anderson-White
Michael J. Benner
Brittany N. Brace
Kourtney C. Burdick
Emilio Camacho
Matthew R. Day
Michael A. Fry
Phanysha C. Gaddis
Paul A. Gale
Jennifer V. Gore
Maita L. Hansen
Jeffrey C. Heeren
Aaron M. Israel
Kevin W. Kunding
Gary P. Lindsey, Jr.

Assistant City Attorneys

Matthew D. Ruyak
Brett M. Witter

Supervising Deputy City Attorneys

Gerald C. Hicks
Steven Y. Itagaki
Gustavo L. Martinez
Andrea Velasquez

Deputy City Attorneys

Andre D. Martin
Jeffrey L. Massey
Megan E. Nevin
Beau E. Parkhurst
Sean D. Richmond
Kathleen T. Rogan
Angel A. Solis
Michael Sparks
Chance L. Trimm
Katherine Underwood
Michael Voss
Lestie Z. Walker
Kurt C. Wendlenner

August 25, 2022

VIA ELECTRONIC FILING

The Honorable Troy L. Nunley
U.S. District Court, Eastern District of California
501 I Street
Sacramento, CA 95814

Re: **Sacramento Homeless Union v. County of Sacramento, et al.**
Eastern District of California Case No. 2:22-cv-01095-TLN-KJN
Matter ID: 22-0689
Document No.: 1187687

Dear Judge Nunley:

Last night at 11:52 p.m., Plaintiffs electronically filed and served a Motion to Extend or Reinstate Preliminary Injunction against Defendant City of Sacramento with a Request for Sanctions against Defendant City of Sacramento. Defendant City respectfully requests that plaintiffs' motion be rejected by the court and/or denied based on plaintiffs' failure to comply with the provisions of Local Rule 231 and Federal Rule of Civil Procedure, Rule 65 relating to both notice of the motion and the scheduling of a hearing date for the motion. The Court will note plaintiffs' motion sets forth no date for a hearing, and therefore defendant City has been given no opportunity to file an opposition to plaintiffs' motion and no opportunity to appear at a hearing and present argument and evidence in opposition to plaintiffs' motion.

Defendant City also respectfully requests that plaintiffs' motion be denied based on plaintiffs' failure to include with their motion a proposed order that sets forth blanks for the time and date set for hearing of preliminary injunction, and the date for filing of responsive papers pursuant to Local Rule 231 (c)(7).

Respectfully submitted,

SUSANA ALCALA WOOD
City Attorney

/s/ CHANCE L. TRIMM
CHANCE L. TRIMM
Senior Deputy City Attorney

CLT/caa

cc: Anthony D. Prince – Via Electronic Filing
Diane Elizabeth McElhern – Via Electronic Filing
Krista C. Whitman - Via Electronic Filing
Leticia Ramirez – Via Electronic Filing